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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2013-676

13 **LA TOYA DENISE CAMPBELL**  
10368 Montrachet Drive  
14 **Baton Rouge, LA 70817**

**A C C U S A T I O N**

15 **Registered Nurse License No. 806706**

Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
21 Consumer Affairs.

22 2. On or about September 20, 2011, the California Board of Registered Nursing issued  
23 Registered Nurse License Number 806706 to La Toya Denise Campbell (Respondent). The  
24 Registered Nurse License was in full force and effect at all times relevant to the charges brought  
25 in this Accusation and will expire on August 31, 2013, unless renewed.

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1 **COST RECOVERY**

2 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
3 administrative law judge to direct a licentiate found to have committed a violation or violations of  
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
5 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
6 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
7 included in a stipulated settlement.

8 **DRUGS**

9 10. "Total Parenteral Nutrition" (TPN) is an intravenous nutrient supplement containing a  
10 nutritionally adequate hypertonic solution consisting of glucose, protein hydrolysates, mineral,  
11 and vitamins, that is premixed specifically for a patient. It is administered through an indwelling  
12 catheter into the superior vena cava or other main vein. The procedure is used when feeding by  
13 mouth cannot provide an adequate amount of essential nutrients.

14 11. "GlucernaR 1.2. Cal" is a medical nutritional product specifically designed to be used  
15 with an enteral delivery system (tube feeding). It is a calorically dense formula consisting of  
16 carbohydrate blend and fish oil. It is dispensed in a ready-to-hang prefilled enteral feeding  
17 container which includes the precaution "Not for IV use" written twice in red bold letters. It is a  
18 dangerous drug pursuant to California Business and Professions Code section 4022.

19 **CAUSE FOR DISCIPLINE**

20 **(Gross Negligence)**

21 12. Respondent was employed as a registered nurse by an Alabama based company and  
22 was hired as a replacement worker to work as a registered nurse at Alta Bates Summit Medical  
23 Center (ABSMC) in Oakland, California, during a five-day employee lock-out.

24 13. Respondent has subjected her license to disciplinary action under Code section 2761,  
25 subdivision (a)(1) on the grounds of gross negligence in that on or between September 23, 2011,  
26 and September 24, 2011, while employed as a (replacement) registered nurse on the oncology  
27 unit at ABSMC, Respondent incorrectly administered the wrong medication through the wrong  
28 route, causing a patient death, as described below:

A. On September 23, 2011, Respondent was assigned to care for Patient J.M.<sup>1</sup>, a sixty-six year old female patient who was hospitalized for complications related to uterine cancer. The patient had a physician's order for TPN to be administered intravenously. Respondent's initials appeared next to the physician's order. Respondent admitted that she did not administer the TPN to the patient.

B. On September 23, 2011, at approximately 8:45 p.m., Respondent admitted that she assembled the GlucernaR 1.2 Cal bottle, initialed the bottle, and attached it to the patient's intravenous pole and infusion pump. There was no physician's order for the GlucernaR 1.2 Cal. The words, "Not for IV use" were written twice in bold red letters on the label.

C. On September 24, 2011, at approximately 12:35 a.m., the patient was found unresponsive in her bed. Life saving measures were initiated, however the patient was pronounced dead at 12:53 a.m. The cause of death is listed as “widespread pulmonary embolization of foreign solid material” and “intravenous infusion of nutritional supplement meant for oral or gastric tube feeding.”

## PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 806706, issued to La Toya Denise Campbell.

2. Ordering La Toya Denise Campbell to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

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<sup>1</sup> The patient's name will be released to Respondent pursuant to a request for discovery.

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3. Taking such other and further action as deemed necessary and proper.

DATED: February 26, 2013 for Stacie Ben  
LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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